

Fax Cover Sheet

To:
United States District Court
District of Delaware
Fax 302-573-6451
Attention: Betty.

From:
Joseph M. Ward
Telephone 252-393-6150

Pursuant to my telephone conversation with Betty this morning, I am faxing a redacted Exhibit A to replace the Exhibit A in my subpoena addressed to MBNA America in Civil Case Number 4:04-CV-88-H2 (Eastern District of North Carolina).

I am planning to have some one pick up the subpoena and serve it this afternoon or tomorrow morning. Service needs to be done promptly.

Thank you for your assistance with this matter.

JMW

EXHIBIT A

I. Definitions

1. "You" or "Your" means MBNA AMERICA BANK (DELAWARE).
2. "Patricia B. Ward" refers to Patricia B. Ward with the following identifying information:

Name: Patricia B. Ward

Swansboro, NC 20504

Social Security # 7-6694

Date of Birth: 1932

3. "Joseph M. Ward" refers to Joseph M. Ward with the following identifying information:

Name: Joseph M. Ward

Swansboro, NC 20504

Social Security # 7-2519

Date of Birth: 1924

II. Documents to be Produced

1. A paper writeout of computer stored information relating to any and all log entries in Patricia B. Ward's MBNA America credit card application file, which occurred during the interval beginning when her application was referred to RSK on 7/22/2003 by someone with the UNIQUE ID of 32199 and ending with the last entry on Patricia B. Ward's application record (# IDENTIFIER #0189793221).
2. A paper writeout of computer stored information relating to any and all log entries in Joseph M. Ward's computer file which were entered in connection with Patricia B. Ward's application for an MBNA credit card during the interval beginning on June 22, 2002 and ending on May 31, 2005.

